

IN THE UNITED STATES BANKRUPTCY COURT
District of Puerto Rico

In the Matter of:

NOEL HUMBERTO MELENDEZ GONZALEZ
VILMA MARTINEZ RIVERA

Debtor(s)

Case No. **10-04816-BKT**

Chapter 13

MOTION TO OPPOSE DISMISSAL

TO THE HONORABLE COURT:

The debtor, by means of the undersigned counsel, represents as follows:

1. Popular Auto filed a motion requesting the dismissal of present case, based on debtors arrears in the plan and in post-petition payments related with a leased vehicle.
2. On November 3, 2011, debtors mailed to the trustee a money order (attached) to cure the arrears in the plan and are proposing a modification of their plan in order to include the balance of the lease .

WHEREFORE, Debtors pray to the Honorable Court to take notice of the informed above and deny motion filed by the trustee and Popular Leasing.

I HEREBY CERTIFY, that on this same date a true and exact copy of the foregoing has been filed with the clerk of the court using CM/ECF which will notify the trustee and Popular Leasing.

RESPECTFULLY SUBMITTED in Vega Baja, Puerto Rico, this November 3, 2011.

s/ Juan O. Calderon Lithgow
JUAN O. CALDERÓN LITHGOW
Attorney for Debtor, 205607
P.O. Box 1710
Vega Baja, PR 00694-1710
Tel.: 858-5476

MONEY ORDER

Issued by Western Union Financial Services, Inc.
Payable at Wells Fargo Bank Grand Junction - Downtown, N.A., Grand Junction, Colorado

A 109989 D 110211
T 1324 01
143273455961 L 000000

14-327345596

\$ 600.00

PAY EXACTLY SIX HUNDRED DOLLARS AND NO CENTS

PAY TO THE ORDER OF Jose Carrion Chap6113

PAYMENT FOR/ACCT. #

Noel Melendez Garza 10-04816

PURCHASER'S SIGNATURE

⑆102100400⑆ 40143273455961⑈

MONEY ORDER RECEIPT - NON NEGOTIABLE

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AGT 109989 LOC 000000 DT 110211 \$600.00 6HUNDREDDOLLARS AND NO CENTS

Payable to:
RETAIN THIS MONEY ORDER RECEIPT. IT MUST BE INCLUDED WITH ALL REFUND REQUESTS. BE SURE TO READ IMPORTANT INFORMATION BELOW AND ON BACK.
PURCHASE AGREEMENT: You the purchaser agree that Western Union Financial Services Inc. (WUFSI) need not stop payment on, or replace, or refund a lost or stolen WUFSI Money Order unless (1) you fill in the face of the Money Order at the time of purchase, and (2) you report the loss or theft to Western Union Financial Services Inc. in writing immediately, and (3) You provide WUFSI with this original Money Order receipt issued by Western Union Financial Services Inc., Englewood, Colorado. For customer service, call 1-800-999-9690.

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